

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

WILLIE DENNIS,

Defendant.

20-cr-623 (JSR)

ORDER

JED S. RAKOFF, U.S.D.J.:

For the reasons stated at the telephonic conference of October 4, 2022, see Transcript, 10/4/2022, the motions of Rosemary Alito, Michael Caccese, Neil Kelly, Christopher Reynolds, Paul Sweeney, and David Tang to quash the third-party subpoenas (here attached) propounded on them by pro se defendant Willie Dennis are hereby granted, and the subpoenas are quashed.

SO ORDERED.

New York, NY
October 5, 2022


JED S. RAKOFF, U.S.D.J.

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America)

Dennis)

Case No. 20 Cr.623 (LGS)

Defendant)

SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Rosemary Alito, K & L Gates
 1, Newark Center, 1085 Raymond Blvd
 Newark, New Jersey 07102
 Rosemary.alito@klgates.com
 973-848-4022

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place of Appearance: Southern District of New York 500 Pearl Street New York, New York 10007	Courtroom No.: 1106
	Date and Time: September 28, 2022 at 9:30 am

You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

Please see attached.

(SEAL)

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (*name of party*) _____
 _____, who requests this subpoena, are:

Willie Dennis
 6858 Hidden Glade Place
 Sanford, Florida 32771
 woc2020@gmail.com
 646-509-6889

Case No. 20 Cr.623 (LGS)

PROOF OF SERVICE

This subpoena for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Brady and Giglilon Material

A. Minutes of the Meetings of the Executive Committee of the Firm

The minutes of the Executive Committee of the KL Gates (" KL Gates "), members in attendance, resolutions passed and all communications (whether in "hard copy," electronic, or any other form, and including (without limitation) emails, text messages, instant messages, voicemails and any other recordings or recordations) from, to or copying any member of KL Gates (" Communications ") that concern, refer or relate to, or otherwise involve (or involved) Mr Dennis with respect to the following:

1. the suspension of Mr Dennis from KL Gates on January 19, 2019;
2. the settlement proposal delivered by KL Gates to Mr Dennis on January 30, 2019;
3. the expulsion of Mr Dennis from KL Gates on May 20, 2019;
4. the decision by KL Gates to file a criminal complaint with the District Attorney;
5. the decision by KL Gates to file a criminal complaint with the Southern District;
6. the decision by KL Gates to hire a private investigation firm to surveil Mr Dennis at the Corporate Counsel Women of Color at its annual conference in September of 2019
7. the decision by KL Gates to alter the compensation arrangement between Mr Dennis and Robert Matlin ;
8. the decision and rationale supporting KL Gates' refusal KL to not meet with Bruce Jackson of Microsoft during all of 2018.
9. the decision by KL Gates not to institute my suggestions of " best practices " with respect to sexual harassment complaints made by women attorneys of KL Gates

To the extent there were no KL Gates executive committee meetings with respect to these matters, the persons who made such decisions and the basis of their authority should be identified . Such material must include the communications between, among others, Rosemary Alito (Executive Committee member and the Global Head of KL Labor and Employment practice) Michael Cacesse, James Segerdhal and David Tang.

B. Sexual Harassment

1 All communications between the members of the Executive Committee of KL Gates relating to Mr Dennis request after reviewing this article in December 2018 <https://www.law.com/thelegalintelligencer/2018/12/12/at-kl-gates-women-alleged-misconduct-and-left-as-accused-partners-stayed-on/>, for a more transparent sexual harassment process within KL Gates .

2 The names of all partners of KL Gates who had sexual harassment complaints filed against them (We need to determine if any of the witnesses testifying against me were accused of sexual harassment)

3 All e-mails between the members of Executive Committee of KL Gates in connection with the article written by Alexis Shane entitled "K&L Gates Calls Former Partner Serial Harasser" Law360 dated, November 20, 2020

4 All e-mails between all the members of the Executive Committee of KL Gates relating to the article entitled "K&L Gates Ex-Partner's Bias Suit Stayed For Arbitration" By Marco Poggio Law360 (March 25, 2021)

C. Compensation

1. The names of the partners of KL Gates who were allocated Mr Dennis' business origination credits after his expulsion on May 20, 2019, including the names of the clients (We need to determine if any of the witnesses financially benefited from the complaints filed against me);

2 The names of the partners of KL Gates who serviced Mr Dennis' clients after his suspension on January 19, 2019;

3. Copies of all Communications between and among Annette Becker and the members of the Executive Committee of KL Gates with respect to the meeting with Bruce Jackson of Microsoft, Annette Becker and Mr Dennis at the Pershing Square Cafe in August of 2017 .

4 Copies of all Communications between Michael Zanic and the members of the Executive Committee of KL Gates relating to the phone call Mr Zanic had with Bruce Jackson of Microsoft relating to Mr Dennis on or about January 27, 2018.

5. All Communications between the members of the Executive Committee of KL Gates relating to Mr Dennis' e-mail in November of 2018 identifying a potential business conflict between Amazon and Microsoft.

6. Copies of all Communications between David Tang and the members of the Executive Committee of KL Gates relating to Mr Dennis e-mail to Mr Tang on January in connection with Microsoft client billings.

7. Please provide copies of all financial information relating to Mr Dennis provided by the KL Gates to Michael Todd Mueller, Esq in February of 2019, in connection with Bailey v. Dennis.

8 Please provide copies of all Communications between David Tang and the members of the Executive Committee of KL Gates relating to Mr Dennis' e-mails in October of 2020 to Bradford Smith, the President and Chief Executive Officer of Microsoft relating to the Firm's offices in Beijing, Shanghai, Singapore and Taipei

10 With respect to the following clients of KL Gates Microsoft, PepsiCo, Starbucks, Amazon, Mass Mutual, Enigma, TE Connectivity, American Express, PayPal, Facebook n/k/a Meta and all other clients in which either myself, or Robert Matlin are named as client originators either in part or whole, please provide the following from the date I joined KL Gates:

(i) All documents reflecting inventory, origination, responsible and billing matter credits.

(ii) All documents reflecting fees and costs billed and paid.

(iii) Copies of the annual reports of staffing on all matters, including for each attorney staffed his/her actual local and global billing rates, gender and ethnicity.

D Agreements /Complaints

1. Please provide a copy of the security agreement (s) whether so named or, otherwise between KL Gates and the company retained by KL Gates to conduct surveillance of Mr Dennis at the Corporate Counsel Women of Color annual conference in September of 2019 at the Chicago Marriott

2. Please provide a copies of all sponsorship agreements between KL Gates and the Corporate Counsel Women of Color. (I am being accused of racist and sexually harassing e-mails. In the last agreement I was specifically named as mandatory relationship partner because of my 17 years of support of the organization)

3. Please provide a copy of the complaint relating to Mr. Dennis filed by KL Gates with the 17th Precinct of the City of New York on or about September 4, 2019

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(b) Retainer Agreement(s) between Firm and PepsiCo relating to the PepsiCo/Starbucks class action litigation referenced in Paul Sweeney's email dated December 2019 (the "PepsiCo/Starbucks Litigation") along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.

(c) Retainer Agreement(s) between the Firm, and Starbucks relating to the PepsiCo/Starbucks Litigation, along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.

(d) Retainer Agreement(s) between Firm and Amazon relating to any matters in connection with Amazon's establishment of substantial new places of business in New York, New Jersey, Washington, DC, Virginia (the "Amazon Business" per James Segerdahl e-mail communication to all partners dated November 2018) along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any

(e) Retainer Agreement(s) between the Firm and Mass Mutual.

(f) Retainer Agreement(s) between the Firm and Lockheed Boeing, along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any

(g) Retainer Agreement(s) between Respondent and Facebook n/k/a Meta, along with any stated or agreed upon understandings reflecting either's stated or agreed upon diversity goals, if any.

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

UNITED STATES DISTRICT COURT

for the

United States of America)

Dennis)

Case No. 20 Cr.623 (LGS)

Defendant)

SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Michael Caccese, K&L Gates
 1 Lincoln Street
 Boston, MA 02111
 michael.caccese@klgates.com
 617-261-3133

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(SEAL)

CLERK OF COURT

Date: _____

*Signature of Clerk or Deputy Clerk*The name, address, e-mail, and telephone number of the attorney representing (*name of party*) _____

_____, who requests this subpoena, are:

Willie Dennis
 6858 Hidden Glade Place
 Sanford, Florida 32771
 woc2020@gmail.com
 646-509-6889

Case No. 20 Cr.623 (LGS)

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(d) Retainer Agreement(s) between Firm and Amazon relating to any matters in connection with Amazon's establishment of substantial new places of business in New York, New Jersey, Washington, DC, Virginia (the "Amazon Business" per James Segerdahl e-mail communication to all partners dated November 2018) along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any

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(g) Retainer Agreement(s) between Respondent and Facebook n/k/a Meta, along with any stated or agreed upon understandings reflecting either's stated or agreed upon diversity goals, if any.

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America)

DeYmis)

Case No. 20 Cr.623 (LGS)

Defendant)

SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Neil Kelly, Federal Defenders of New York
52 Duane Street
New York, New York 10007

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place of Appearance: Southern District of New York 500 Pearl Street New York, New York 10007	Courtroom No.: 1106
	Date and Time: October 11, 2022 at 9:30 am

You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

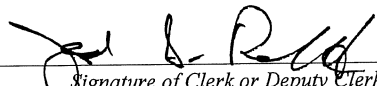
Please see attached.

(SEAL)

CLERK OF COURT

Date:

8/10/22


Signature of Clerk or Deputy Clerk
JSD

The name, address, e-mail, and telephone number of the attorney representing (*name of party*) _____

, who requests this subpoena, are:

Willie Dennis
6858 Hidden Glade Place
Sanford, Florida 32771
woc2020@gmail.com
646-509-6889

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case (Page 2)

Case No. 20 Cr.623 (LGS)

PROOF OF SERVICE

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Neil Kelly-Attachment

All communications (whether in “hard copy,” electronic, or any other form, and including (without limitation) emails, text messages, instant messages, voicemails and any other recordings or recordations) “ Communications “ from, to or copying any (i) attorney of Proskauer Rose, including, Kathleen McKenna, Rachel Fischer and Haddasa Waxman (ii) attorney of Norton Rose Fulbright, including Ralph Dawson, (iii) attorney within the offices of the Federal Defenders in New York or (iv) any other person that concern, refer or relate to, or otherwise involve (or involved) Mr Dennis with respect to the following:

1. During your representation of Mr Dennis, your decision not to issue any subpoenas on behalf of Mr. Dennis ?
2. During your representation of Mr. Dennis your decision not to file a “ speedy “ trial motion on behalf of Mr. Dennis ?

Communications includes you or any agents acting on your behalf.

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America

DeYnis

Defendant

Case No. 20 Cr.623 (LGS)

SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Christopher Reynolds, Toyota North America
 6565 Headquarters Drive
 Plano, Texas 75024
 christopher_reynolds@toyota.com
 469-292-1975

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

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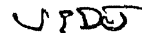
(SEAL)

Date: 8/23/22

CLERK OF COURT



Signature of Clerk or Deputy Clerk



The name, address, e-mail, and telephone number of the attorney representing (name of party) _____, who requests this subpoena, are:

Willie Dennis
 6858 Hidden Glade Place
 Sanford, Florida 32771
 woc2020@gmail.com
 646-509-6889

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case (Page 2)

Case No. 20 Cr.623 (LGS)

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\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Attachment- Christopher Reynolds

All communications (whether in "hard copy," electronic, or any other form, and including (without limitation) emails, text messages, instant messages, voicemails and any other recordings or recordations) " Communications " from, to or copying any (i) attorney within the Department of Justice, including Damian Williams, (ii) any current or former partner of KL Gates, including Kim Askew and Jill Louis (iii) Board Member or officer of Microsoft, including, John W. Thompson, Bradford Smith and Bruce Jackson, (iv) Kevin G. Chavers of BlackRock (v) Eric Holder of Covington & Burling (vi) Ralph Dawson of Norton Rose Fulbright, (vii) Theodore Shaw of the University of North Carolina at Chapel Hill,(viii) James E. Johnson and (viii) other person that concern, refer or relate to, or otherwise involve (or involved) Mr Dennis with respect to the following:

1. Mr Reynold's inclusion on the " No Contact List " dated December 1, 2021 prepared by the Department of Justice in connection with U.S. v. Dennis, 20 Cr. 623 (LGS)
2. Kevin Chaver's (BlackRock) inclusion on the " No Contact List " dated December 1, 2021 prepared by the Department of Justice in connection with U.S. v. Dennis, 20 Cr. 623 (LGS)
3. John W Thompson's (the former Chairman and current Board Member of Microsoft) inclusion on the " No Contact List " dated December 1, 2021 prepared by the Department of Justice in connection with U.S. v. Dennis, 20 Cr. 623 (LGS)
4. Bradford Smith's (the President and Chief Legal Officer of Microsoft) inclusion on the " No Contact List " dated December 1, 2021 prepared by the Department of Justice in connection with U.S. v. Dennis, 20 Cr. 623 (LGS)
5. Mr Dennis' e-mails to Mr Reynolds from August 28, 2019 through and including October 10, 2019.
6. Willie Dennis v. K&L Gates LLP, et al., No. 1:20-cv-09393-MK.

Communications includes you or any agents acting on your behalf.

Please provides copies of the following:

Copies of any e-mails sent by you to Mr Dennis.

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

UNITED STATES DISTRICT COURT

for the

Southern District of New York



United States of America)

Dennis)

Case No. 20 Cr.623 (LGS)

Defendant)

SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: David Tang, K&L Gates
 925 4th Avenue #2900
 Seattle, Washington 98104
 205-370-7617
 david.tang@klgates.com

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Signature of Clerk or Deputy ClerkThe name, address, e-mail, and telephone number of the attorney representing (*name of party*) _____

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Willie Dennis
 6858 Hidden Glade Place
 Sanford, Florida 32771
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To the extent there were no KL Gates executive committee meetings with respect to these matters, the persons who made such decisions and the basis of their authority should be identified . Such material must include the communications between, among others, Rosemary Alito (Executive Committee member and the Global Head of KL Labor and Employment practice) Michael Cacesse, James Segerdhal and David Tang.

B. Sexual Harassment

1 All communications between the members of the Executive Committee of KL Gates relating to Mr Dennis request after reviewing this article in December 2018 <https://www.law.com/thelegalintelligencer/2018/12/12/at-kl-gates-women-alleged-misconduct-and-left-as-accused-partners-stayed-on/>, for a more transparent sexual harassment process within KL Gates .

2 The names of all partners of KL Gates who had sexual harassment complaints filed against them (We need to determine if any of the witnesses testifying against me were accused of sexual harassment)

3 All e-mails between the members of Executive Committee of KL Gates in connection with the article written by Alexis Shane entitled "K&L Gates Calls Former Partner Serial Harasser" Law360 dated, November 20, 2020

4 All e-mails between all the members of the Executive Committee of KL Gates relating to the article entitled "K&L Gates Ex-Partner's Bias Suit Stayed For Arbitration"
By Marco Poggio Law360 (March 25, 2021)

C. Compensation

1. The names of the partners of KL Gates who were allocated Mr Dennis' business origination credits after his expulsion on May 20, 2019, including the names of the clients (We need to determine if any of the witnesses financially benefited from the complaints filed against me);

2 The names of the partners of KL Gates who serviced Mr Dennis' clients after his suspension on January 19, 2019;

3. Copies of all Communications between and among Annette Becker and the members of the Executive Committee of KL Gates with respect to the meeting with Bruce Jackson of Microsoft, Annette Becker and Mr Dennis at the Pershing Square Cafe in August of 2017 .

4 Copies of all Communications between Michael Zanic and the members of the Executive Committee of KL Gates relating to the phone call Mr Zanic had with Bruce Jackson of Microsoft relating to Mr Dennis on or about January 27, 2018.

5. All Communications between the members of the Executive Committee of KL Gates relating to Mr Dennis' e-mail in November of 2018 identifying a potential business conflict between Amazon and Microsoft.

6. Copies of all Communications between David Tang and the members of the Executive Committee of KL Gates relating to Mr Dennis e-mail to Mr Tang on January in connection with Microsoft client billings.

7. Please provide copies of all financial information relating to Mr Dennis provided by the KL Gates to Michael Todd Mueller, Esq in February of 2019, in connection with Bailey v. Dennis.

8 Please provide copies of all Communications between David Tang and the members of the Executive Committee of KL Gates relating to Mr Dennis' e-mails in October of 2020 to Bradford Smith, the President and Chief Executive Officer of Microsoft relating to the Firm's offices in Beijing, Shanghai, Singapore and Taipei

10 With respect to the following clients of KL Gates Microsoft, PepsiCo, Starbucks, Amazon, Mass Mutual, Enigma, TE Connectivity, American Express, PayPal, Facebook n/k/a Meta and all other clients in which either myself, or Robert Matlin are named as client originators either in part or whole, please provide the following from the date I joined KL Gates:

(i) All documents reflecting inventory, origination, responsible and billing matter credits.

(ii) All documents reflecting fees and costs billed and paid.

(iii) Copies of the annual reports of staffing on all matters, including for each attorney staffed his/her actual local and global billing rates, gender and ethnicity.

D Agreements /Complaints

1. Please provide a copy of the security agreement (s) whether so named or, otherwise between KL Gates and the company retained by KL Gates to conduct surveillance of Mr Dennis at the Corporate Counsel Women of Color annual conference in September of 2019 at the Chicago Marriott

2. Please provide a copies of all sponsorship agreements between KL Gates and the Corporate Counsel Women of Color. (I am being accused of racist and sexually harassing e-mails. In the last agreement I was specifically named as mandatory relationship partner because of my 17 years of support of the organization)

3. Please provide a copy of the complaint relating to Mr. Dennis filed by KL Gates with the 17th Precinct of the City of New York on or about September 4, 2019

4 With respect to the following clients of KL Gates Microsoft, PepsiCo, Starbucks, Amazon, Mass Mutual, Enigma, TE Connectivity, American Express, PayPal, Facebook n/k/a Meta and all other clients in which either myself, or Robert Matlin are named as client originators either in part or whole, please provide the following from the date I joined KL Gates :

(a) Retainer Agreement(s) and engagement letters between the KL Gates and Microsoft, along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.

(b) Retainer Agreement(s) between Firm and PepsiCo relating to the PepsiCo/Starbucks class action litigation referenced in Paul Sweeney's email dated December 2019 (the "PepsiCo/Starbucks Litigation") along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.

(c) Retainer Agreement(s) between the Firm, and Starbucks relating to the PepsiCo/Starbucks Litigation, along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any.

(d) Retainer Agreement(s) between Firm and Amazon relating to any matters in connection with Amazon's establishment of substantial new places of business in New York, New Jersey, Washington, DC, Virginia (the "Amazon Business" per James Segerdahl e-mail communication to all partners dated November 2018) along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any

(e) Retainer Agreement(s) between the Firm and Mass Mutual.

(f) Retainer Agreement(s) between the Firm and Lockheed Boeing, along with any agreements or understandings reflecting either's stated or agreed upon diversity goals, if any

(g) Retainer Agreement(s) between Respondent and Facebook n/k/a Meta, along with any stated or agreed upon understandings reflecting either's stated or agreed upon diversity goals, if any.